

Salazar, Matt

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From: Luther, Mahiany <Mahiany.Luther@sdcounty.ca.gov>  
Sent: Wednesday, August 24, 2016 2:52 PM  
To: Salazar, Matt  
Subject: RE: Subpart HHHHHH -Automotive Coating Operations

Hi Matt,

It sounds like the bulk terminal inspections went pretty well. Unfortunately I was not able to meet Andrew but I was informed he had some questions regarding 6Hs. Please let me know if you need additional information.

Thank you,  
Mahiany P. Luther  
Chief-Departmental Operations  
Compliance Division  
(858) 586-2725

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"DIVERSITY counts but INCLUSION is making sure everyone counts"

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From: Luther, Mahiany  
Sent: Thursday, August 11, 2016 1:29 PM  
To: 'Salazar.Matt@epa.gov' <Salazar.Matt@epa.gov>  
Subject: Subpart HHHHHH -Automotive Coating Operations

Hi Matt,

It was nice talking to you today. Please find below a summary of the automotive coating requirements we enforce. I have also attached one of our permits that is subject to 6H.

- **NESHAP 6H Delegation**

San Diego has had delegation to enforce the requirements of NESHAP- Subpart HHHHHH since the regulation was adopted in 2008. Out of 35 air Districts only 12 Districts have delegation to enforce this regulation and San Diego is one of them.

- **6H requirement**

Subpart HHHHHH of the National Emission Standards for Hazardous Air Pollutants, *Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources*, applies to automotive refinishing operations that spray apply coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP. However, § 63.11170(a)(2) of the regulation states "...if you are the owner or operator of a motor vehicle or mobile equipment surface coating operation, you may petition the Administrator for an exemption from this subpart if you can demonstrate, to the

*satisfaction of the Administrator, that you spray apply no coatings that contain the target HAP, as defined in §63.11180. Petitions must include a description of the coatings that you spray apply and your certification that you do not spray apply any coatings containing the target HAP...”*

In 2011 the District revised all automotive coating permits to accurately reflect the applicable requirements of 6Hs. The automotive coating operations that petitioned the exemption have specific conditions prohibiting spray application of target HAPs. The other operations that didn't petition an exemption have conditions in their permits to ensure ongoing compliance with all applicable requirements. In addition the District sent out a compliance [advisory](#) to all operators to specifically address the requirement of subpart 6Hs.

- **Operations exempt from permitting requirements**

The District has an exemption for automotive coating operations that either use less than 20 gallons per year of coating or emit less than 150 pounds of VOC per year. Although these operation are exempt from permitting requirements they would be subject to subpart 6Hs unless the operator petitioned an exemption (as specified by § 63.11170(a)(2)).

In addition, all operations exempt from permitting requirements are subject to District [Rule 67.20.1](#), *Motor Vehicle and Mobile Equipment Coating Operations*, which regulates the volatile organic compounds emitted from coatings and solvents used at automotive coating operations and [District Rule 51](#), *Public Nuisance*.

The District investigates all sources that meet the criteria of a public nuisance. California Health and Safety Code Section 41700 and [District Rule 51](#) states that no person can discharge air contaminants that cause injury, nuisance or annoyance to any considerable number of persons or the public, or that endanger the comfort, health or safety of such persons

- **Other applicable requirements**

In addition to subpart 6H (federal requirement), the District enforces the following regulations that are applicable to automotive coating operations:

- o District [Rule 67.20.1](#), which regulates the volatile organic compounds from coatings and solvents used at automotive coating operations
- o New Source Review, which regulates volatile organic compounds
- o Airborne Toxic Control Measure (ATCM), which is a state regulation that controls emissions of hexavalent chromium and cadmium (toxic air contaminants)
- o Toxic New Source review, which is a local regulation that controls emissions of various toxic air contaminants
- o District Rule 51, *Public Nuisance*

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